

# EXHIBIT 21

**Proposed Schedule for Litigation of Securities Claims**

**In re PG&E Corp., Case No. 19-30088 (Bankr. N.D. Cal. 2019)**

**Class Certification & Discovery**

<b>Event</b>	<b>Deadline</b>
Joint motion to withdraw reference regarding motions to dismiss, pursuant to 28 U.S.C. § 157(d), to District Court	November 9, 2023
First mandatory class mediation	7-14 days after District Court grants joint motion to withdraw reference, or as soon thereafter as practicable
Initial disclosures; Reorganized Debtors produce all documents produced in related derivative action	7 days after first mandatory mediation
Requests for production	7 days after initial disclosures
Motion for class certification and expert reports	21 days after initial disclosures
Deposition of PERA and its expert(s)	7-14 days after motion for class certification and expert reports
Opposition to motion for class certification and expert report(s) on price impact, etc.	21 days after motion for class certification
Deposition(s) of Reorganized Debtors' expert(s)	7-14 days after Reorganized Debtors' opposition to PERA's motion for class certification
Reply in support of motion for class certification and responding expert reports	21 days after Reorganized Debtors' opposition to motion for class certification
Class certification hearing	7 days after PERA's reply in support of motion for class certification, or as soon thereafter as is convenient for the Court

Motion for class notice and appointment of Class Administrator	14 calendar days after order granting class certification
Hearing on class notice	21 calendar days after motion for class notice, or as soon thereafter as is convenient for the Court
Kroll provides the Securities Claimants' email and mailing addresses to the Class Administrator	5 business days after the Court approves class notice
Class notice issued to the Securities Claimants via ECF, email, and U.S. mail	7 business days after the Class Administrator's receipt of the Securities Claimants' email and mailing addresses
Opt-out deadline	30 days after issuance of class notice
Second mandatory class mediation	7-14 days after opt-out deadline, or as soon thereafter as practicable
Close of fact discovery	14 days after second mandatory class mediation

### **Merits Expert Discovery**

Opening expert reports (on any issue for which a party must carry the burden)	21 days after close of fact discovery
Expert depositions on opening reports	7-14 days after opening expert reports
Opposing expert reports	21 days after expert depositions on opening reports
Expert depositions on opposing expert reports	7-14 days after opposing expert reports

### **Pretrial Order & Motions in Limine**

Joint pretrial order & motions <i>in limine</i>	45 days after close of expert discovery
Responses to motions <i>in limine</i>	7 days after joint pretrial order & motions <i>in limine</i>

**Confidential Negotiation Communication**

**Subject to FRE 408**

Replies to motions <i>in limine</i>	7 days after responses to motions <i>in limine</i>
-------------------------------------	--

**Final Pretrial Conference & Trial**

Final pretrial conference	14 days after replies to motions <i>in limine</i>
Trial date	7 days after final pretrial conference, or as soon thereafter as is convenient for the Court